Before the
Federal Communications Commission
Washington, D.C 20554

In the Matter of	)	
	)	
Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities	)	GN Docket No. 13-111
CellAntenna Corp. Request for Amendment of Section 2.807 of the Commission's Rules (47 C.F.R § 2.807) to Allow the Use of Radio Frequency Jamming Equipment by Local and State Law Enforcement Agencies and Emergency Response Providers	)	RM-11430
Petition of the GEO Group, Inc. for Forbearance From Application of Sections 302, 303, 333 of The Communications Act of 1934, as amended, And Sections 2.803 and 2.807 of the Commission's Rules to Allow State and Local Correctional Authorities to Prevent Use of Commercial Mobile Radio Services at Correctional Facilities	)	ET Docket No 08-73
CTIA --- The Wireless Association Petition for Declaratory Ruling Regarding the Unlawful Sale And Use of Cellular Jammers and Wireless Boosters and Repeaters	)	WT Docket No. 10-4
South Carolina Department of Corrections Request for Authorization of Managed Access Systems within Correctional Institutions in Order to Improve Public Safety Under Conditions that Protect Legitimate CMRS Users	)	PRM09WT
Mississippi Department of Corrections Request for Authorization of Managed Access Systems within Correctional Institutions in Order to Improve Public Safety Under Conditions that Protect Legitimate CMRS Users	)	PRM09WT

Global Tel*Link Corp. Request Amendment of Sections 22.3(b), 1.931 and Subpart X of the Commission's Rules and Creation of New Rule(s) To Authorize a Plurality of Technical Solutions to Eradicate the Unauthorized Use of Wireless Devices in Correctional Facilities	)	PRM11WT
CellAntenna Corp. Request for Amendment of Section 20.5 of the Commission's Rules, 47 C.F.R § 20.5, to Categorically Exclude Service to Wireless Devices Located on Local, State, or Federal Correctional Facility Premises	)	PRM11WT

COMMENTS OF THE GEO GROUP, INC.

The GEO Group, Inc. (GEO), by its attorney, hereby submits its comments in response to the Notice of Proposed Rulemaking in the above-captioned matter.

Introduction

GEO is a private corporation which manages and operates correctional facilities, both in the United States and around the world, with facilities located in New York, Florida, Georgia, Pennsylvania, Virginia, Indiana, North Carolina, Louisiana, Texas, Oklahoma, Arizona, Colorado, California New Mexico and Washington. In addition to constructing and operating prisons, jails, correctional facilities and detention centers, GEO operates community re-entry facilities and other special needs institutions as well as the provision of community supervision services with the use of electronic monitoring. Housing approximately 61,000 inmates in fifty-six correctional facilities across the United States, GEO is one of the nation's leading private managers and operators of prisons and jails. GEO's U.S. Corrections & Detention division

represents the sixth largest correctional system in the country. Through contracts with government agencies, GEO provides services on behalf of the Federal Bureau of Prisons, U.S. Marshals Service, and U.S. Immigration and Customs Enforcement, as well as 11 state correctional clients and various county and city jurisdictions.

GEO's day-to-day operations not only provide for secure custody services, but also correctional health and mental health care; food services; academic and vocational programming; and rehabilitation treatment. Inmates in GEO's facilities are provided restricted telephone service under controlled circumstances. Telephone service is available through a telecom service provider who has entered into a contract with either GEO or GEO's correctional agency client. These contracts may include a negotiated commission payment to GEO in exchange for the telecom service provider being chosen to deliver inmate telephone service at GEO's correctional facilities. However, these commission revenues are utilized to cover the costs of providing inmate telephone service at the correctional facility, as well as the overall costs of operating and maintaining the facilities. Alternatively, these commission revenues are often utilized to fund inmate welfare programs at GEO's correctional facilities or used to offset the cost that GEO charges the government agency.

GEO has undertaken three recent studies on the use of unauthorized wireless devices in its correctional facilities. The first study was performed by CellAntenna and involved a housing unit of 400 federal prisoners at GEO's Reeves County Detention Center in Pecos, Texas. GEO houses federal prisoners at this facility under a contract with the Federal Bureau of Prisons (BOP). Between January 1, 2010 and November 14, 2010, CellAntenna deployed CPC cell phone control equipment at the facility. CellAntenna interrogated both CDMA and GSM protocols with the CPC, allowing all wireless devices within the targeted area to be detected.

However, the targeted area was isolated to the housing unit and away from the main facility. The detection device included 6 antennas and was housed in a telecommunications closet within the housing unit. The goal of the study was to capture both the serial number and subscription number (ESN/MIN or IMEI/MSI) of each wireless device in the targeted area, as well as identify the devices' CRMS providers. While the unauthorized devices were detected, they were not jammed. Nor did GEO provide a list of the ESN/MIN or IMEI/MSI to any CMRS providers. During the test period, CellAntenna's equipment identified 563 unauthorized wireless devices within the 400 prisoner housing unit. The majority of the devices were GSM cell phones, which allow for prisoners to remove the subscriber identity module (SIM) card from the device, if confiscated, so that the card can be used in future devices. The study concluded that "the quantity of cell phones exceed the amount of inmates, as a result of cell phones being brought in and removed from the facility by the inmates."

GEO also conducted a more limited study at its Big Springs Correctional Center in Big Spring, TX which houses approximately 3,500 federal prisoners under another contract with BOP. The study was performed by CellAntenna on February 7, 2012 from 4:31 pm to 6:38 pm using CellAntenna's CPC equipment located in a GEO passenger van. The van was parked outside the facility, and the CPC antennas were directed solely towards the facility in order to isolate wireless transmissions from the community. The study was estimated to cover less than 40% of the facility. Similar to the earlier study, the goal of this study was to capture both ESN/MIN or IMEI/MSI for each wireless device, as well as identify the devices' CRMS providers. No wireless devices were jammed. This test identified fifty-one unauthorized wireless devices during a two hour period. As with the earlier test, the majority of the detected devices were GSM cell phones. The study noted that ideally the CPC equipment should have

been connected to an interior antenna system within the facility in order to better target unauthorized wireless devices. Based on this limited study, GEO estimated that its Big Spring Correctional Center contained a minimum of 204 cell phones with a possible maximum of 306 cell phones during the test period.

Finally, GEO is conducting a study at its South Bay Correctional Facility in South Bay, FL. This facility houses 1,898 state inmates pursuant to a contract between GEO and the Florida Department of Management Services. Again, the study is being performed by CellAntenna. It began in January 2013 and is currently continuing. CellAntenna's CPC equipment is again being utilized with antennas hidden within the facility. Again, no wireless devices are being jammed. To date, over 400 unauthorized cell phones have been identified, with the CPC equipment capturing both ESN/MIN or IMEI/MSI of each device, as well as identifying the devices' CRMS providers. The study identifies the location of the unauthorized wireless device in the facility, allowing staff to perform searches of inmates' cells in order to try and recover the contraband wireless device. The process of searching and recovering the device is time consuming, places the safety of the correctional officers at risk, and is not always successful. Based on the results of the study, GEO compiled a list of the ESN/MIN or IMEI/MSI for each wireless device, as well as a list of the devices' CRMS providers. Unfortunately, the CRMS providers have been slow to act upon GEO's requests to suspend service to the identified unauthorized wireless devices at the South Bay Correctional Facility.

I. Detection and Suspension of Service to Contraband Wireless Devices

GEO supports the Commission's proposed rulemaking which would allow an authorized official to detect a contraband wireless device within a correctional facility, notify the device's

CMRS provider that the device is unauthorized, and then the CMRS provider would be required to suspend service to the unauthorized device.

A. Detection of Contraband Wireless Devices

As noted above, GEO conducted three studies during the past three years in which unauthorized wireless devices were detected in two facilities housing federal inmates and one facility housing state inmates. GEO used direction-finding antennas to triangulate a wireless signal and then identify the ESN/MIN or IMEI/MSI of the devices in order to then identify the service provider for each device. In one study, GEO embedded six antennas in a telecommunications closet within a 400 inmate housing unit. This limited the scope of the study to this particular housing unit. GEO successfully detected a total of 563 unauthorized devices during an eleven month study, and GEO was able to identify the devices' serial / subscription number, as well as the CRMS provider. As noted above, the number of unauthorized wireless devices outnumbered the total inmate population for that housing unit during the study period.

In the second study, GEO used portable antennas in order to identify unauthorized wireless devices. More specifically, antennas were housed in a passenger van located right outside the facility's fence line. This limited the scope of the study to that radius of the correctional facility where the antennas were pointed. During a two hour period, GEO successfully detected 51 unauthorized devices. Both these studies demonstrate the success of using direction-finding antennas to triangulate a wireless signal and then identify the devices' serial / subscription number and CRMS provider.

B. Constraints of Detection Only Policy

The use of a "detection only" policy; however, will not resolve the issue of contraband wireless devices in correctional facilities. During all three GEO studies, the unauthorized devices had to have been operating at the time that GEO was searching for them. Detection devices are ``passive" receive-only devices. During GEO's studies, non-operating contraband wireless devices could not be identified. Further, mere detection of the device by GEO did not assure confiscation of the device. It has been GEO's experience that inmates are creative when concealing both wireless devices and the SIM cards used to store phone numbers and text messages on the device. Further, confiscation of the device requires a team of GEO correctional officers to search for and retrieve the device. The physical search is time consuming and is not always successful. The search also creates yet another situation which possibly threatens the safety of GEO's correctional officers.

C. Detection and Then Suspension of Wireless Devices

GEO supports a two-step approach to the elimination of contraband wireless devices in correctional facilities: (1) the detection of the devices and (2) then the suspension of the wireless service for the contraband devices. Under this proposal, GEO correctional officers would perform an electronic sweep using equipment which can identify the wireless device's ESN/MIN or IMEI/MSI. After identifying the unauthorized device, a GEO official would transmit a "Notice of Contraband Wireless Device" to the CMRS provider identifying the contraband

wireless device by ESN/MIN or IMEI/MSI. Within one hour after receipt of this notice, the CMRS provider would suspend service to the contraband wireless device.

In the case of the study at the Reeves County Detention Center, GEO was able to identify the serial number, the subscription number, and CRMS identification of 563 unauthorized wireless devices during an eleven month period. In the case of the study at Big Springs Correctional Center, GEO was able to identify the same information for 51 devices during a two hour period. In the case of the study at the South Bay Correctional Center, GEO was also able to identify the same information for 400 devices during the last five months.

While GEO did not seek the suspension of the unauthorized wireless devices during the Reeves or Big Spring studies, GEO did seek suspension during the South Bay study. Unfortunately, CRMS providers have been slow to act upon GEO's requests to suspend service to identified unauthorized wireless devices at the South Bay Correctional Center. If the CRMS provider had been required to suspend service within one hour of notice, GEO would have been able to eliminate approximately 400 unauthorized cell phones at the South Bay Correctional Center.

II. Definition of "Qualifying Authority"

In the proposed rule, the FCC states: "after the detection system identifies a contraband device, an authorized correctional facility official would be permitted to request termination of service to the device by the CMRS provider after providing relevant information." More specifically, the proposed rule includes the following language:

§ 20.21 Service termination upon notice of an unauthorized user. CMRS providers are required to terminate service to any device identified by a qualifying authority as unauthorized within the confines of a correctional facility.

GEO supports a broad definition of "qualifying authority" to include wardens of both public and private correctional facilities. We recommend the following definition: "Qualifying Authority. The chief executive or administrative official in charge of a secure correctional facility, whether operated or managed by the Federal government, a State or local government, or a private entity."

Without such a definition, any new regulation promulgated by FCC on this subject will be unclear as to whether GEO, or any other private prison operator, is authorized to stop contraband wireless use in its correctional facilities. Without such a definition, CMRS providers may be uncertain as to whether they are required to terminate service upon receipt of a "Notice of Contraband Wireless Device" from GEO or another private prison operator. Such uncertainty will result in continued unauthorized usage of wireless devices in private correctional facilities, placing the safety of private correctional officers and the safety of the general public at risk.

CONCLUSION

The GEO Group, Inc. is a leading manager and operator of correctional facilities housing federal, state, and local inmates. Like public correctional facilities, GEO has concerns regarding the use of unauthorized wireless devices in its facilities. Inmate telephone communication, within GEO facilities, is restricted and controlled for security reasons. GEO's studies have

detected use of unauthorized wireless devices in its facilities -- identifying the serial number, the subscription number, and identification of the CRMS provider. However, CRMS providers have been slow to respond to suspension requests. Therefore, GEO supports the Commission's proposed rule which would establish a process for detection and suspension of unauthorized wireless service. Further, GEO requests that the Commission define the term "Qualify Authority" broadly, in order to allow GEO officials the ability to participate in the CRMS notification process.

Respectfully submitted,

THE GEO GROUP, INC.

By: _____

Joseph Summerill
The Summerill Law Firm, PLLC
1250 Connecticut Avenue, NW
Suite 200
Washington, D.C. 20036
(202) 261-3588

Its Attorneys

May 31, 2013